

C. Cotton Decl. Exhibit 16



October 6, 2025

VIA ELECTRONIC MAIL

Christopher V. Cotton

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Re: *In re: Uber Technologies, Inc.*, No. 3:23-md-03084-CRB (N.D. Cal.)

Counsel:

I write to initiate a meet and confer regarding Plaintiffs listed in **Attachment 1**. PTO #5 requires each Plaintiff to “submit a bona fide ride receipt” from an Uber trip connected to the alleged incident. PTO #5, ¶ 4 (ECF 175). The listed Plaintiffs have violated PTO #5 and have not provided a bona fide receipt. It is Defendants’ position that these cases should be dismissed with prejudice.

I have included all law firms representing Plaintiffs on Attachment 1 on this communication, as well as Plaintiffs’ MDL leadership in the transmittal. Given the fast-moving nature of this docket and impending trials in this matter, it is imperative that we meet and confer on these issues promptly this week. I can make myself available most times this week to accommodate the group’s schedules. Please provide your availability to meet and confer this week.

SHOOK
HARDY & BACON

Best regards,

Christopher V. Cotton

Christopher V. Cotton
Partner



ATTACHMENT 1

1. 3666 – Pulaski Law Firm, PLLC
2. 3699 – Pulaski Law Firm, PLLC
3. 3787 – Pulaski Law Firm, PLLC
4. 3877 – Reich and Binstock, LLP
5. 3921 – Peiffer Wolf Carr Kane Conway & Wise
6. 3962 – Reich and Binstock, LLP
7. 3977 – Reich and Binstock, LLP